



*Sent to  
Frank Foote*

September 6th, 2005

Mr. John Manfreda  
Administrator  
Alcohol and Tobacco Tax and Trade Bureau  
U.S. Treasury  
1310 G Street, NW  
Washington, DC 20220

Re: Vintage Date Regulation

Dear Mr. Manfreda:

I am petitioning the TTB in favor of its notice of proposed rulemaking to make changes to the vintage date requirements. As the winemaker for Canyon Road in California, I am confident the proposed change to lower the current threshold of wine that must be derived from grapes harvested in the labeled calendar year from 95% to 85% will benefit US winemakers. The proposed changes will provide US wine producers with the flexibility needed to compete more effectively with international winemakers and the ability to provide more consistent high quality wine for our consumers.

Winemakers abroad from such places as Australia, New Zealand and the European Union are provided with the ability to produce wine using 15% of grapes from older vintages. This assists these wineries in achieving a consistent style target when the current vintage may have produced a more acidic wine for example. This flexibility provided to international wine producers provides them with greater access to consistent final products and ultimately provides them with the ability to provide a better value to consumers.

Unfortunately, the 95% rule is unenforceable against international competition, allowing them to continue to produce wines at this lower threshold and importing it to the US. In order to address this issue adequately, I would argue that TTB must harmonize the standards with the rest of the world and provide US winemakers with the ability to compete more effectively for consumers' desire for consistency in taste and value. By lowering the vintage dating threshold to 85% for US wine producers, TTB could achieve this goal and level the playing field for US wines.

Thank you for your attention to this very important matter.

Sincerely,

Daryl Groom  
SVP Production & Winemaking

